



February 29, 2016

**VIA ELECTRONIC FILING**

Marlene Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: EB Docket 06-36  
Annual 47 C.F.R. § 64.2009(e) CPNI Certification**

Dear Mrs. Dortch:

On behalf of Puerto Rico Cable Acquisition Company LLC (hereinafter referred to as "Choice"), pursuant to 47 C.F.R. §64.2009(e), enclosed please find Choice's annual CPNI compliance certification for calendar year 2015 and an accompanying statement describing Choice's CPNI compliance policies and procedures.

Sincerely,

Alexandra Verdiales  
In-House Counsel  
Liberty Cablevision of Puerto Rico, LLC

Enclosures

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification for 2016 Covering the Prior Calendar Year 2015**

Date filed: March 1, 2016

Name of company covered by this certification: Puerto Rico Cable Acquisition Company LLC

Form 499 Filer ID: 827792

Name of signatory: Naji Khoury

Title of signatory: President & C.E.O.

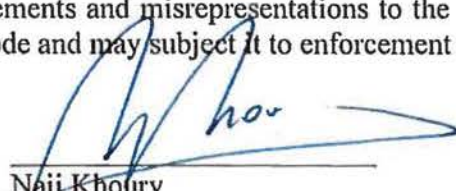
I, Naji Khoury, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, safeguards, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules (see attached Accompanying Statement).

The company has not taken any actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.



Naji Khoury  
President & C.E.O.

Attachment: Accompanying Statement explaining CPNI procedures

ACCOMPANYING STATEMENT TO  
Annual 47 C.F.R. § 64.2009(e) CPNI Certification  
For the period of January 1<sup>st</sup> until December 31<sup>st</sup>, 2015

**EB Docket 06-36**

Puerto Rico Cable Acquisition Company LLC. (hereinafter the "Company") has established adequate procedures to ensure that it is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Federal Communications Commission's rules<sup>1</sup> (hereinafter the Rules). Accordingly, LCPR hereby sets forth the following:

1. The Company uses its customers' CPNI solely in accordance with the CPNI Rules. It does not disclose to or otherwise permit the availability of CPNI to third parties. Access to Company's customers' CPNI is restricted, available only to its employees as necessary to perform their duties as part of Company's provision of its VoIP service.
2. The Company has taken reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI. Customers are properly authenticated prior to disclosing CPNI based on customer-initiated telephone contact, online account access, or an in-store visit.
3. The Company has designated its President & C.E.O as the officer or agent with personal knowledge to certify compliance with the CPNI Rules ("CPNI agent").
4. The Company does not disclose to or otherwise permit the availability of CPNI within the Company for marketing purposes.
5. The Company does not disclose to or otherwise permit the availability of CPNI to joint venture partners, independent contractors or any other third party for marketing purposes.
6. The Company has approved and trained its Customer Service personnel on its Policy and Procedure for CPNI Protection during customer-initiated telephone account access requests and in-store visits, to effectively protect against pretexting and illegal data brokers. The Company has established an adequate policy and procedures that require proper training of all Customer Service personnel with regard to when they are and are not authorized to use or disclose CPNI, and all such personnel are required to implement such policy, subject to a disciplinary process which can lead to immediate suspension and even termination depending on the gravity of the circumstances involved in the breach. Pursuant to the Rules, the procedures encompass, *inter alia*, the requirements for the setup and changes of Passwords to access CPNI online and

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<sup>1</sup> As amended by the Report and Order and Further Notice of Proposed Rulemaking, *In the matter of Implementation of the Telecommunications Act of 1996: Telecommunications Carriers' Use of Customer Proprietary Network Information and Other Customer Information*, CC Docket No. 96-115, WC Docket No. 04-36, *rel.* April 2, 2007.

through Customer Service. They also encompass the customer notification requirements for changes in the Address of Record pursuant to the Rules.

7. The Company has established procedures adequate for compliance with the Rules in relation to the establishment of a password and back-up authentication methods for lost or forgotten passwords for access to CPNI. If the customer cannot provide the correct password or the correct response for the back-up customer authentication method, the customer must establish a new password.
8. The Company has established the procedures to immediately send a carrier-originated notification to the customer pursuant to the Rules, whenever a password, customer response to a back-up means of authentication for lost or forgotten passwords, online account, or address of record is created or changed, and without revealing the changed information.
9. As part of the Company's policy and procedures for CPNI Protection, in regard to any type of administrative (law enforcement) or court subpoena, or under request by any third party (i.e., anyone other than the properly authenticated customer him/herself), without exception, all such CPNI requests are sent to the Company's CPNI agent for proper action. The CPNI agent (and back-up personnel) is prepared to adequately act upon valid law enforcement requests, as well as any improper requests, and has knowledge of when a CPNI breach notification to the U.S. Secret Service and the F.B.I. is required, through the CPNI Breach Reporting Facility, and related notice hold requirements under the Rules.
10. The Company had no issues with data brokers in 2015. Therefore, no action was required.
11. The Company had no customer complaints regarding unauthorized disclosure of CPNI during 2015.